MGPI Draft Review

Calculation Comments / Revisions

3596 Calc A.xls

1. "Summary" worksheet, Potential to Emit After Control, Fugitive Emissions: Updated link so that emissions from equipment leak fugitives are 128.2 tpy VOC and 0.90 tpy HAP.

2. "Summary" worksheet, Potential to Emit After Issuance of Permit: EU-13: Shouldn't EU-13 PTE after issuance for PM2.5 also default back to pre-controlled emission rate as it does for EU-12?

3. "Summary" worksheet, Potential to Emit After Issuance of Permit: EU-97: For GHG and HAP emissions from boiler, should NG emissions plus FO emissions be summed together as was done for other pollutants?

4. "Cooler" worksheet: Replaced hard-entered values for Hammer mill emission factors with quantities calculated as in application (no change to factors).

5. "Cooler" worksheet: The Hammer Mill controlled emission rates are hard-entered and differ from permit application. What is basis for calcs? Emission rates have been entered as calculated in permit application for comparison.

6. "Cooler" worksheet: Values in row 28 appear to be extraneous and can be removed.

7. "Cooler" worksheet: Revision to note (a) is needed since controlled emissions from grain conveying no longer are equivalent to uncontrolled emissions.

8. "Cooler" worksheet: Notes (b) and (c): Mill emissions calculations are now assuming 85% reduction for PM, PM10 and PM2.5. This approach contradicts size-specific collection efficiencies presented in Note (b), as well as calculations presented in permit application (see #5 above).

9. "DDG Dryer" worksheet: Corrected link for VOC lb/hr limited PTE (cell J31)

10. "DDG Dryer" worksheet: Why is Acetaldehyde Limited PTE taken as a 40% reduction from uncontrolled PTE? Why is Formaldehyde Limited PTE taken as 50% reduction from uncontrolled PTE?

11. "DDG Dryer" worksheet: Note (d): Equations for uncontrolled emission calculations in rows 79 and 80 are not correct. Suggest replacing equations in rows 77 through 80 with the similar equations describing HAP emission calculations in rows 82 through 85.

12. "Wet Pad" worksheet: Revised total lb/hr HAP emission rate by including correct link for Methanol lb/hr emissions.

3596 Calc B.xls

1. "Cooler" worksheet: Replaced hard-entered values for Hammer mill emission factors with quantities calculated as in application (no change to factors).

2. "Cooler" worksheet: Uncontrolled emission rates are calculated from controlled rates assuming 95% control for PM and PM10 and 80% for PM2.5. This control % contradicts Note (b) below.

3. "Cooler" worksheet: Revision to note (a) is needed since controlled emissions from grain conveying no longer are equivalent to uncontrolled emissions.

4. "Cooler" worksheet: Notes (b) and (c): Mill emissions calculations are now assuming 95% reduction for PM, PM10 and 80% for PM2.5. This approach contradicts size-specific collection efficiencies presented in Note (b), as well as calculations presented in permit application (see #2 above).

5. "Wet Pad" worksheet: Revised total lb/hr HAP emission rate by including correct link for Methanol lb/hr emissions.

6. "DDG Dryer" worksheet: Note (d): Equations for uncontrolled emission calculations in rows 79 and 80 are not correct. Suggest replacing equations in rows 77 through 80 with the similar equations describing HAP emission calculations in rows 82 through 85.